

PROGRESS REPORT NO. 152

TO: Monica Tonel, U.S. Environmental Protection Agency (EPA) – via Email

Kathryn Cerise, EPA – via Email

FROM: Kris McCaig, Teck American Incorporated (TAI)

Cc: Denise Mills, TAI – via Email

DATE: March 8, 2019 FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study

(RI/FS) - Progress Report No. 152 Month Ending February 2019

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES) – TAI continued coordination with the SATES team and Kira Lynch, Superfund Technology Liaison with the Office of Research and Development, Office of Science and Policy during the month. TAI continued preparation of the draft Phase II work plan, which includes the proposed plan for bench-scale testing and evaluation of amendments. TAI plans to submit the draft work plan to EPA for review in mid-March 2019. TAI submitted the Phase IA Data Summary Report to EPA on February 28, 2019, following EPA's approval received by email on January 28, 2019. Also, on February 28, 2019, TAI received a summary of additional biochar research that EPA Office of Research and Development (ORD) is proposing to further evaluate the potential applicability of biochar for metals remediation in soils. This research would be conducted with RARE ORD grant funds. As of this writing, EPA had a call with TAI on March 8, 2019 to discuss their proposal. On March 1, 2019, TAI received an addendum to EPA's results of biochar screening results from Dr. Johnson, with refined conclusions and recommendations. These results will be incorporated into the Phase II work plan.

Baseline Ecological Risk Assessment:

Soil Toxicity Reference Values (TRVs) – TAI received comments from EPA on December 24, 2018 on the revised approach for developing soil TRVs and currently reviewing and evaluation the comments. TAI and EPA had a call to discuss the comments on February 15, 2019 and a follow up call on February 28, 2019. TAI

obtained a clear understanding of EPA's comments and will proceed with revising the approach memo and resubmitting for EPA review.

Fish Diet TRVs – TAI submitted a revised draft final Fish Diet TRV document to EPA on February 14, 2019 based on comments received from EPA in a letter dated December 13, 2018 with comments on the July 2018 draft final document.

Wildlife TRVs – TAI delivered a revised draft final Wildlife TRV document to EPA on February 6, 2019 in response to a letter received from EPA on December 24, 2018 with comments on the September 2018 draft final document.

Sediment and Porewater TRVs – TAI worked with EPA in February to develop an agenda and materials for a workshop to discuss EPA's comments on the October 2019 draft final TRV document. At the time of writing, the workshop was held on March 5-6, 2019 and follow up will occur in the coming months.

Chemicals of Potential Concern (COPC) Refinement Document – TAI delivered a revised draft final COPC Refinement for Aquatic and Terrestrial Receptors to EPA on February 22, 2019 in response to a letter dated November 20, 2018 from EPA with comments on the July 2018 draft final document.

Phase 3 Sediment Study – TAI delivered the final technical memorandum for the Freeze Grab Pilot Study on February 1, 2019. TAI submitted a draft final technical memorandum for the Porewater Sampling Pilot Study to EPA on February 15, 2019 in response a letter dated December 31, 2018 with EPA's comments on the draft technical memorandum. TAI delivered a draft technical memorandum titled Draft Sediment Facies Maps for Upper Reach Operable Unit Areas of Interest Upper Columbia River Phase 3 Sediment Study on February 8, 2019 for EPA review. EPA provided comments to TAI on February 19, 2019 and TAI delivered a revised memo in response to the comments, on February 26, 2019.

Delineation Study – TAI received overarching comments on the preliminary draft Data Quality Objectives for the delineation study (delivered to EPA on September 27, 2018) via electronic mail on February 15, 2019 with a request for a meeting to discuss the comments. TAI will work with EPA to schedule the meeting in the coming months.

Human Health Risk Assessment – TAI is in receipt of a letter dated February 22, 2019 from EPA transmitting the Draft Final Data Analysis Report for the Recreational Use Survey for TAI's review and comment.

Data Management Plan – TAI is in receipt of a letter dated February 27, 2019 from EPA transmitting EPA's comments on the Draft Final Data Management Plan for the UCR Site RI/FS and TAI is reviewing and evaluating the comments.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.